REMARKS

Claims 1, 12, and 21 are amended. Claims 1, 4-12, 16-21, and 24-28 are pending. In view of the following remarks, Applicant respectfully requests reconsideration of the rejections.

Examiner Interview

Counsel would like to thank Examiner Williams for a telephonic interview on October 14, 2010. During the interview, proposed amendments to independent claims 1, 12, and 21 were discussed with respect to the § 101 rejections. In light of the interview, counsel provided proposed amendments. Examiner Williams indicated that such amendments would remove the § 101 rejections. Accordingly, the proposed amendments to independent claims 1, 12, and 21 are included above. Applicant sincerely appreciates the Examiner's willingness to work with Applicant in advancing prosecution.

§101 Rejections

Claims 1 and 4-11 stand rejected under 35 U.S.C. § 101 as allegedly being directed to non-statutory subject matter for "failing to be tied to a particular machine...the recitation of 'a computing device' [is] not necessarily stated or claimed to be embodied in hardware structure" (Office Action, pg. 3). Applicant respectfully disagrees. However, in the interest of advancing meaningful prosecution, claim 1 has been amended as indicated above to further clarify its

statutory nature. Applicant respectfully requests withdrawal of the Office's § 101

rejection of claim 1. Claims 4-11 are statutory as depending from a statutory base

claim.

Claims 12, 16-21, and 24-28 stand rejected under 35 U.S.C. § 101 as

5   allegedly being directed to non-statutory subject matter for not appearing "to

preclude the use of signals" (Office Action, pg. 3). Applicant respectfully

disagrees and submits that computer storage media is indeed statutory. However,

to further clarify the statutory nature of computer storage media, claims 12 and 21

have been amended as indicated above to further clarify their statutory nature.

10   Claims 16-20 and 24-28 are statutory as depending from a statutory base claim.

Applicant respectfully requests withdrawal of the Office's § 101 rejections of

claims 12, 16-21, and 24-28.

§ 102 Rejections

15   Claims 1, 4-12, 16-21, and 24-28 stand rejected under 35 U.S.C. § 102(b)

as allegedly being anticipated by "Abstracting Application-Level Web Security"

by Scott et al. (hereinafter "Scott").

For the reasons set forth below, Applicant respectfully traverses the

Office's rejections.

20

The Claims

Claim 1 has been amended and, as amended, recites a computer-implemented method, comprising [emphasis added]:

- receiving, with a computing device that includes software and hardware
5   on which the software operates, data input through a web page from a client device;
- *referencing a declarative module*, embodied on computer storage media associated with the computing device, to determine a client input security screen to apply to the data input from the client device, wherein
10   the declarative module comprises:
- *a global section* that includes at least one client input security screen *that applies to any type of client input value*; and
- an individual values section that includes at least one client input security screen that applies to a particular type of client input value; and
15 - applying, using the computing device, multiple client input security screens to the data input from the client device, including at least one client input security screen from the global section of the declarative module and at least one client input security screen from the individual values section of the declarative module, wherein the client input
20   security screens are distinct from one another, and *wherein said act of referencing comprises first using the global section to screen one or more client input values and then using the individual values section* to screen at least one of said one or more client input values.

25   In making out the rejection of claim 1, the Office argues that its subject matter is allegedly anticipated by Scott. Applicant respectfully disagrees. For the reasons set forth below, Applicant respectfully traverses the Office's rejection.

Scott on pg. 3, col. 2, para. 2, merely describes a *policy compiler* responsible for generating Security Policy Description Language (SPDL) code
30 which is loaded into a *security gateway* which acts as a firewall. Missing is any discussion of "referencing a declarative module…" as claimed. As such, Applicant submits that the Office's reliance on this excerpt is misplaced.

Additionally, Fig. 2 and pg. 6 (col. 1 – paras. 1-2) of Scott simply fail to

disclose "a global section…" as claimed. Specifically, with respect to Fig. 2, this

figure shows a Document Type Definition (DTD) specifying two *individual types*

of client values nested under the policy element, namely a Universal Resource

5   Locator (URL) type ("Element URL" which in turn has a URL-parameter type:

"Element parameter" nested under it) and a cookie type ("Element cookie" nested

under "Element URL"). In this regard, the URL-parameter type and the cookie

type each are shown as potentially having a validation type ("Element validation")

and transformation type ("Element transformation") nested below them. Since

10   Fig. 2, at best, shows two *individual types of client values*, neither the nested

transformation type (for individual client value types URL-parameter and cookie)

nor any other feature shown in Fig. 2 can be said to disclose "a global section …

that applies to *any type of client input*" as this is understood in the context of the

claim language (e.g., "a global section … and an individual values section…") or

15   in the context of the subject application.

In this regard, and by way of example and not limitation, the Office is

directed to pg. 9 (lines 16-20) of the subject application which describes "all types

of input values" screened by "a global screening portion". This excerpt is

reproduced below for the Office's convenience (emphasis added):

20   As previously stated, the global screening portion 234 screen all
                types of input values: *URL parameters, header values, form values*
                and cookies. Therefore, any screened values will be screened from
                all these types of values in the global screening portion 234.

Furthermore, with respect to pg.6 (col. 1 – paras. 1-2), this excerpt merely describes the two *individual types of client values* identified in the DTD shown in Fig. 2 (i.e., the URL-parameter and cookie client value types). Accordingly, for the reasons given above, this excerpt cannot be said to disclose "a global section

5 … that applies to *any type of client input*" either.

Finally, even if Scott did disclose "a global section…" as claimed, which it does not, Section 3.4 fails to disclose "…*first using the global section*" as claimed - and instead actually teaches away from this subject matter. Paras. 1-3 of Section 3.4 describe Fig. 4, which depicts an algorithm that *first* checks parameters and

10 cookies (which the Office equates with an *individual values section* (see Office Action, pg. 5)), *then* applies transformations (which the Office equates with a *global section* (Office Action, pg. 4)). Accordingly, by teaching an algorithm that *first* checks parameters and cookies and *then* applies transformations, Fig. 4 and paras. 1-3 teach directly away from "…*first using the global section*". As such,

15 the Office's reliance on Section 3.4 is misplaced.

Accordingly, in view of the above discussion, Scott fails to disclose the subject matter of claim 1. Hence, for at least this reason, claim 1 is allowable.

Claims 4-11 depend from claim 1 and are allowable as depending from an allowable base claim. These claims are also allowable for their own recited

20 features which are neither shown nor suggested by the reference of record.

Claim 12 has been amended and, as amended, recites a system, comprising [emphasis added]:

- a web page server unit, embodied on one or more computer storage media and configured to provide one or more web pages to one or more client devices over a distributed network;
- means for receiving client input data;
- a declarative module, embodied on computer storage media and configured to include multiple client input security screens that declare screening rules for client input, wherein the declarative module comprises:
- *a global section* that includes one or more client input security screens that are applied to *all types of client input*; and
- an individual values section that includes one or more client input security screens that are applied to specified types of client input; and
- a client input security screening unit configured to apply the screening rules for client input to the client input data and to perform one or more actions on invalid client input data, wherein the screening rules are from distinct client input security screens from the global section and the individual values section, *wherein the client input security screening unit is configured to first use the global section to screen one or more client input values and then use the individual values section* to screen at least one of said one or more client input values, and wherein the one or more computer storage media does not comprise a signal.

In making out the rejection of claim 12, the Office argues that its subject matter is allegedly anticipated by Scott. Applicant respectfully disagrees. For the reasons set forth below, Applicant respectfully traverses the Office's rejection.

As noted above, pg. 3 (col. 2 – para. 2) of Scott merely describes a *policy compiler* responsible for generating SPDL code which is loaded into a *security gateway* which acts as a firewall. Missing is any discussion of "a declarative module" as claimed. Additionally, Fig. 2 and pg. 6 (col. 1 – paras. 1-2) of Scott simply fail to disclose "a global section..." as claimed. Specifically, with respect to Fig. 2, this figure shows a DTD specifying *two individual types of client values* nested under the policy element. Neither the nested transformation type (for individual client value types URL-parameter and cookie) nor any other feature

shown can be said to disclose "a global section that includes one or more client input security screens that are applied to _**all**_ _**types of client input**_". Furthermore, with respect to pg. 6 (col. 1 – paras. 1-2), this excerpt merely describes the two _**individual types of client values**_ identified in the DTD shown in Fig. 2 and

5 therefore cannot be said to disclose this subject matter either.

Finally, even if Scott did disclose "a global section..." as claimed, which it does not, Section 3.4 and Fig. 4 describe/depict an algorithm that _**first**_ checks parameters and cookies and _**then**_ applies transformations. As noted above, this not only fails to teach "... to _**first use the global section**_" as claimed, but in point of

10 fact actually teaches directly away from it. As such, the Office's reliance on Section 3.4 is misplaced.

Accordingly, in view of the above discussion, Scott fails to disclose the subject matter of claim 12. Hence, for at least this reason, claim 12 is allowable.

Claims 16-20 depend from claim 12 and are allowable as depending from

15 an allowable base claim. These claims are also allowable for their own recited features which are neither shown nor suggested by the reference of record.

Claim 21 has been amended and, as amended, recites one or more computer-readable storage media containing computer-executable instructions that, when executed on a computer, implement a method comprising [emphasis

20 added]:

- serving a web page to a client over a distributed network;
- receiving client input via the web page;

- comparing the client input with multiple and distinct client input security screens stored in a security declarative module, wherein the security declarative module includes *a global section configured to screen all types of client input values* and an individual values section configured to screen particular types of client input values, *wherein the global section is used to first screen one or more client input values and then the individual values section is used* to screen at least one of the one or more client input values;

- *if invalid client input is detected, performing a screening action* on the invalid client input *as indicated by the security declarative module*, wherein the client input security screens included in the security declarative module can be applied to multiple web pages, and wherein the one or more computer-readable storage media does not comprise a signal.

In making out the rejection of claim 21, the Office argues that its subject matter is allegedly anticipated by Scott. Applicant respectfully disagrees. For the reasons set forth below, Applicant respectfully traverses the Office's rejection.

As noted above, pg. 3 (col. 2 – para. 2) of Scott merely describes a *policy compiler* responsible for generating SPDL code which is loaded into a *security gateway* which acts as a firewall. Missing is any discussion of "a security declarative module" as claimed. Unfortunately, the Office has not provided an explanation as to which specific features from this excerpt it is relying on and equating with this subject matter. Nevertheless, Applicant has thoroughly searched the entire Scott reference (including Fig. 5 and pgs. 3, 4 and 6) and is unable to find any discussion of this subject matter. As such, Fig. 5 and pgs. 3, 4 and 6 cannot possibly disclose "if invalid client input is detected, performing a screening … as indicated by the security declarative module" as claimed.

Furthermore, Fig. 2 and pg. 6 (col. 1 – paras. 1-2) of Scott simply fail to disclose "a global section…" as claimed. Specifically, with respect to Fig. 2, this figure shows a DTD specifying *two individual types of client values* nested under the policy element. Neither the nested transformation type (for individual client

5   value types URL-parameter and cookie) nor any other feature shown in Fig. 2 can be said to disclose "a global section configured to screen ***all*** *types of client input values*. Furthermore, with respect to pg. 6 (col. 1 – paras. 1-2), this excerpt merely describes the two *individual types of client values* identified in the DTD shown in Fig. 2 and therefore cannot be said to disclose this subject matter either.

10   Finally, even if Scott did disclose "a global section…" as claimed, which it does not, Section 3.4 and Fig. 4 describe/depict an algorithm that *first* checks parameters and cookies and *then* applies transformations. As noted above, this not only fails to teach "… to *first use the global section*" as claimed, but in point of fact actually teaches directly away from it. As such, the Office's reliance on

15   Section 3.4 is misplaced.

Accordingly, in view of the above discussion, Scott fails to disclose the subject matter of claim 21. Hence, for at least this reason, claim 21 is allowable.

Claims 24-28 depend from claim 21 and are allowable as depending from an allowable base claim. These claims are also allowable for their own recited

20   features which are neither shown nor suggested by the reference of record.

Response to Response to Arguments:

Applicant disagrees with the Office's statements in the "Response to Arguments" section and wishes for the record to reflect that the amendments above in no way constitute an admission of the propriety of the rejections or an

5 acquiescence to the statements that appear in the "Response to Arguments" section.

Conclusion

All of the claims are in a condition for allowance. Accordingly, Applicant

10 respectfully requests that the Office issue a Notice of Allowability. If the Office's next anticipated action is to be anything other than issuance of a Notice of Allowability, Applicant respectfully requests a telephone call for the purpose of scheduling an interview.

15   Respectfully submitted,

         Dated: 11/18/2010   By: /Lance R. Sadler/

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